

IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
CORPUS CHRISTI DIVISION

PATRICIA MCLEAD AND PATRICK	§	
MCLEAD, INDIVIDUALLY AND AS	§	
REPRESENTATIVE OF THE ESTATE OF	§	
GARRETT MCLEAD, DECEASED; ET AL.	§	
Plaintiffs	§	
	§	
v.	§	CIVIL ACTION NO. C-08-264
	§	
L-3 COMMUNICATIONS VERTEX	§	
AEROSPACE, LLC	§	
Defendant	§	

JOINT MOTION FOR ENTRY OF AN AGREED AMENDED PROTECTIVE ORDER

COME NOW Plaintiffs and Defendant and request that the Court enter the attached Agreed Amended Protective Order (Atch. A).

The Court has previously entered an Agreed Protective Order under which the U.S. Army has been assembling voluminous flight and maintenance records but has not yet been able to produce such records to the parties. The Army's Litigation Division has found that the work involved in redacting all or part of each identified individuals' social security number is extremely time consuming and is delaying their production of the records.

The Litigation Division has requested that the Court amend the Agreed Protective Order to direct the records be produced without social security redaction, with a corresponding directive that the social security numbers not be disclosed to anyone not involved in this litigation.

The Agreed Amended Protective Order adds that language in paragraphs 9 and 10. The parties ask the Court to enter the Agreed Amended Protective Order so that the maintenance and flight records may be produced immediately.

Respectfully submitted,

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